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BY ECF

Hon. Alvin K. Hellerstein
Daniel Patrick Moynihan United States Courthouse
Courtroom 14D
500 Pearl St.
New York, NY 10007

Re: United States v. Charlie Javice and Olivier Amar, 23 Cr. 251 (AKH)

Dear Judge Hellerstein:

JPMorgan Chase Bank, N.A. (“JPMC”) respectfully submits this letter motion to request that the Court accept the proposed sealed and redacted versions of JPMC’s motion to quash (ECF No. 254-259). Specifically, JPMC respectfully submits that sealing is warranted as to the following:

- Portions of pages 1, 2, 3, 5, and 6 from JPMC’s Memorandum of Law in Support of Motion to Quash Defendants’ Rule 17(c) Subpoenas (the “Memorandum of Law”) (ECF No. 258);
- Portions of page 7 of the subpoena issued to JPMC by Defendant Charlie Javice pursuant to Fed. R. Crim. P. 17(c), dated January 13, 2025, attached as Exhibit A to the Declaration of Greg D. Andres (the “Andres Declaration”) (ECF No. 259-1); and
- Portions of page 7 of the subpoena issued to JPMC by Defendant Charlie Javice pursuant to Fed. R. Crim. P. 17(c), dated January 29, 2025, attached as Exhibit B to the Andres Declaration (ECF No. 259-2).

These narrowly tailored redactions are necessary to protect the privacy of potential or anticipated witnesses and their identifying information. This court has ruled that “[t]he privacy interests of innocent third parties”—such as the witnesses at issue here, all of whom are current or former employees of nonparty JPMC and/or Frank—“should indeed weigh heavily in the Court’s balancing equation” in evaluating whether to redact the names of witnesses. *Citgo Petro. Corp. v. Starstone Ins. SE*, 2023 WL 7497858, at *2 (S.D.N.Y. Nov. 9, 2023); *see also Oklahoma Firefighters Pension & Ret. Sys. v. Musk*, 2024 WL 2305264, at *2 (S.D.N.Y. May 20, 2024) (“[C]ase law holds that [an employee’s name] may be redacted where an employee is not a party to action in light of the individual’s privacy interests.”). JPMC therefore submits that the sealing of the above-referenced materials is warranted and requests that the Court accept the redactions outlined above.

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As required by Rule 4(B)(i) of the Court's Individual Rules, the parties submit herewith:

- (i) Unredacted copies of the Memorandum of Law and Exhibits A-B, which, if JPMC's requests were granted, would be placed under permanent seal; and
- (ii) Proposed public versions of the Memorandum of Law and Exhibits A-B.

We are available to provide any additional information that would be helpful to the Court and thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Greg D. Andres

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